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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ROGER HALDE,
 	
       Plaintiff,
 	
       v.
 	
ANDREW SAUL,
Commissioner of Social Security,
 	
       Defendant.
	Case No.: 2:19-cv-01247-EJY
	
	UNOPPOSED MOTION FOR EXTENSION OF TIME
	(***FIRST REQUEST***)

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or Remand (Dkt. No. 17, filed on December 26, 2019), currently due on January 27, 2020, by 30 days, through and including February 26, 2020. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 14) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension because Defendant's counsel recently conferred with Plaintiff's counsel to determine whether this matter can be resolved by settlement. The additional requested time will allow for continued discussions with Plaintiff's counsel, and if the matter cannot be resolved, to allow counsel to prepare a

response to the pending motion. Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

On January 24, 2020, counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion.

It is therefore respectfully requested that Defendant be granted an extension of time to respond to Plaintiff's Motion for Remand, through and including February 26, 2020.

Dated: January 24, 2020

Respectfully submitted,

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney

IT IS SO ORDERED:

_____
UNITED STATES MAGISTRATE JUDGE

DATED: _____January 30, 2020_____